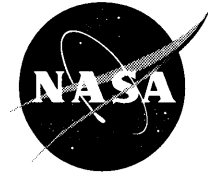


Headquarters

Washington, DC 20546-0001



August 19, 2004

Reply to Attn of:

Office of the General Counsel

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance at the Reception for the Delta IV Heavy Demo Launch at Cape Canaveral Air Force Station in Florida

The Boeing Company (Boeing) will host a reception for the Delta IV Heavy Demo launch at Cape Canaveral Air Force Station (CCAFS) in Florida, September 10, 2004. It has been determined to be in the best interest of the Government for those NASA employees who are invited to this event to attend in their official capacities and as representatives of NASA.

The event will celebrate the inaugural service of the Delta IV Heavy Rocket. The ceremony will build public awareness of the rocket and its capabilities, and help to generate support among the public and members of Congress in supporting this rocket and the Department of Defense space program. The reception will be widely attended by officials from other Federal agencies, state and local governments, the military, members of Congress and their staffs, and private contractor representatives. Boeing will host a welcome reception at the Radisson Resort, provide light snacks at the Banana Creek viewing site, and host a light celebratory brunch the morning following the launch. The total value of the food and beverages would be approximately \$50 per person. This event will allow NASA employees an opportunity to discuss issues of interests and concern to NASA with officials from other Federal agencies, members of Congress and their staffers, state and local governments, the military and members of the aerospace community. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I, therefore, conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, may appear to, improperly influence NASA employees in the performance of their official duties.

Accordingly, NASA employees and their spouses or guests may attend the event without charge.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon", with a long, sweeping flourish extending to the right.

R. Andrew Falcon